

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

JACKSONVILLE POLICE AND FIRE )  
PENSION FUND, on behalf of itself and )  
all others similarly situated, )  
  ) 08-CV-4772 (RJS)  
Plaintiff,                         ) ECF Case  
                                       )  
v.                                     )  
                                       )  
AMERICAN INTERNATIONAL GROUP, )  
INC., MARTIN SULLIVAN, STEVEN )  
BENSINGER, JOSEPH CASSANO and )  
ROBERT LEWIS,                     )  
                                       )  
Defendants.                         )  
                                       )  
\_\_\_\_\_  
)

(captions continued on following pages)

**THE AIG INSTITUTIONAL INVESTOR GROUP'S RESPONSE TO  
COMPETING MOTIONS FOR CONSOLIDATION, APPOINTMENT  
AS LEAD PLAINTIFF, AND APPROVAL OF COUNSEL**

)  
JAMES CONNOLLY, individually and on )  
behalf of all others similarly situated, )  
  ) 08-CV-5072 (RJS)  
Plaintiff,                                  ) ECF Case  
  )  
  )  
v.    )  
  )  
AMERICAN INTERNATIONAL GROUP,         )  
INC., MARTIN J. SULLIVAN, STEVEN      )  
J. BENSINGER, JOSEPH J. CASSANO,      )  
ROBERT E. LEWIS and DAVID L.         )  
HERZOG,                                    )  
  )  
Defendants.                                )  
\_\_\_\_\_  
)  
MAINE PUBLIC EMPLOYEES                 )  
RETIREMENT SYSTEM, on behalf of      )  
itself and all others similarly situated, ) 08-CV-5464 (RJS)  
  )  
Plaintiff,                                ) ECF Case  
  )  
  )  
v.    )  
  )  
AMERICAN INTERNATIONAL GROUP,         )  
INC., MARTIN SULLIVAN, STEVEN        )  
BENSINGER, JOSEPH CASSANO and        )  
ROBERT LEWIS,                            )  
  )  
Defendants.                                )  
\_\_\_\_\_

---

ONTARIO TEACHERS' PENSION PLAN )  
BOARD, on behalf of itself and all others )  
similarly situated, )  
Plaintiff, ) 08-CV-5560 (RJS)  
v. ) ECF Case  
AMERICAN INTERNATIONAL GROUP, )  
INC., MARTIN SULLIVAN, STEVEN )  
BENSINGER, JOSEPH CASSANO and )  
ROBERT LEWIS, )  
Defendants. )  
\_\_\_\_\_  
)

KBC Asset Management NV (“KBC”), Union Asset Management Holding AG (“Union”), and the General Retirement System of the City of Detroit (“Detroit”) (collectively, “AIG Institutional Investor Group”) recognize that they do not have the largest financial interest among the competing movants. If the Court finds that any of the competing movants with a larger financial interest is incapable or unable to serve as lead plaintiff, or that the AIG Institutional Investor Group can and should contribute in some way to the representation of the putative class, the AIG Institutional Investor Group stands ready, willing, and able to serve in any role to further the interests of the putative class.

Respectfully submitted this 4th day of August, 2008,

/s/ William H. Narwold  
William H. Narwold (WN-1713)  
MOTLEY RICE LLC  
One Corporate Center  
20 Church Street, 17th Floor  
Hartford, CT 06103  
Tel: (860) 882-1676  
Fax: (860) 882-1682

MOTLEY RICE LLC  
Joseph F. Rice  
James M. Hughes  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Tel: (843) 216-9000  
Fax: (843) 216-9450

KIRBY McINERNEY LLP  
Ira M. Press (IP-5315)  
Peter S. Linden (PL-8945)  
825 Third Avenue  
New York, NY 10022  
Tel: (212) 371-6600  
Fax: (212) 751-2540

[Proposed] Lead Counsel

STURMAN LLC  
Deborah Sturman, Esq.  
112 Madison Avenue  
New York, New York 10016-7416  
Tel: 646-932-2040  
Fax: 917-546-2544

Counsel for KBC and Union

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2008, I electronically filed the foregoing ***The AIG Institutional Investor Group's Response to Competing Motions for Consolidation, Appointment as Lead Plaintiff and Approval of Counsel*** with the Clerk of the Court using CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

Date: August 4, 2008

/s/ William H. Narwold  
William H. Narwold (WN-1713)  
MOTLEY RICE LLC  
One Corporate Center  
20 Church Street, 17th Floor  
Hartford, CT 06103  
Tel: (860) 882-1676  
Fax: (860) 882-1682

**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices:

**David Robertson Hassel** - [DavidH@blbglaw.com](mailto:DavidH@blbglaw.com)

**Salvatore Jo Graziano** - [SGraziano@blbglaw.com](mailto:SGraziano@blbglaw.com)

**Jeffrey Charles Zwerling** - [jzwerling@zsز.com](mailto:jzwerling@zsز.com)

**Lisa Merideth Pollard** - [lmpollard@locklaw.com](mailto:lmpollard@locklaw.com)

**Joseph R. Seidman** - [seidman@bernlieb.com](mailto:seidman@bernlieb.com)

**Gerald Harlan Silk** - [jerry@blbglaw.com](mailto:jerry@blbglaw.com)